

Public Notice Submission

Provider Name: Cooperative Network Services, LLC

Summary: Cooperative Network Services, LLC ("CNS") and its fifteen member owner telephone companies ("Member Owners") provide middle and last mile fiber services throughout the rural areas of central MN where middle-mile fiber facilities have been proposed under the NTIA BTOP program. CNS and its Member Owners specifically object to proposed middle-mile services for the Brainerd to Moorhead, MN fiber route. Fiber facilities are already owned and operated by CNS member companies that offer transport, capacity on existing optical networks, and/or window leases. CNS is one of at least two existing providers that already offer service for this route. The submission of this route as a BTOP qualified area for funding is an inaccurate representation of this area. CNS, CNS Member Owners and other area rural independent telephone exchange carriers offer connectivity at T1, DS3, OC3, OC12, OC48, 100 Mb, 1 Gb, and/or 10 Gb. Member owners of CNS have also partnered to achieve cost-effective, high quality connectivity to the cities, towns, community anchor institutions, and critical community facilities along the proposed Brainerd to Moorhead route. Costs associated with these existing facilities have been stated to be among the lowest priced in the country (FCC GN Docket Nos. 09-47, 09-51, 09-137 - Comments of the National Exchange Carrier Association on NBP Public Notice #11). In addition, this conglomerate of independent telephone company networks as well as other MN rural telecommunications providers and ILECs offer both middle-mile and last-mile services including Fiber-to-the-Home (FTTH) and broadband connectivity for rural areas immediately around and reaching far beyond this corridor. These providers have been deeply invested in bringing broadband communications to our rural areas for several years. Therefore, in good faith, it is the belief of CNS and its Member Owners that the proposed Brainerd to Moorhead, MN route and the surrounding areas does not qualify for NTIA BTOP funding.